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Attorneys for Glass America Midwest LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

Corbin William Archer
Lisa Ann Collet Archer

Debtors

**EX PARTE MOTION FOR RULE 2004
EXAMINATION AND PRODUCTION
OF DOCUMENTS**

Case No. 24-bk-21689-JTM

Judge Joel T. Marker

Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure and Local Rule 2004-1, Glass America Midwest, LLC (“**Glass America**”), hereby moves this Court ex parte for an order directing Debtor Corbin William Archer (“**Archer**” or “**Debtor**”), to appear and submit to a Rule 2004 examination to be taken at the offices of Parsons Behle & Latimer, 201 South Main Street, Suite 1800, Salt Lake City, Utah 84111 on August 15, 2024, beginning at 9:00 a.m. or at such other time and place as the parties may agree in writing.

Glass America also requests that the Court order Archer to produce for inspection and copying, by August 9, 2024, at the same offices (or at such other place and means, *e.g.*, email, as the parties may agree in writing, the following documents:

1. All documents evidencing or reflecting payments, funds, or property of any kind or nature whatsoever received by Archer in relation to Connect Auto Glass LLC and/or GMX LLC from January 1, 2020 to present.

2. All contracts between Archer, on the one side, and Connect Auto Glass LLC and/or GMX LLC, on the other side, from January 1, 2020 to present;

3. All communications between Archer and Connect Auto Glass LLC and/or GMX LLC or any of their employees, agents, officers, directors, or controlling parties from January 1, 2020 to present, including without limitation any engagement letters or conflicts waivers between those same parties;

4. All communications between Archer and Gregory Dudey from January 1, 2020 to present, including without limitation any engagement letters or conflicts waivers between those same parties;

The examination of Archer relates to the administration of the Debtors' estate, because it relates to transfers of assets to and from the Debtors and related companies, owned and operated by Archer. Locating and recovering such assets so that they may be available to Glass America or other creditors of the estate and the related companies. Connect was also identified by Archer during the trustee's examination as a company owned by Archer and subsequently sold.

Glass America represents that, pursuant to Local Rule 2004-1, the party to be examined will receive not less than fourteen (14) days written notice of the examination, and fourteen (14) days written notice of the obligation to produce documents.

DATED this 24th day of July, 2024.

PARSONS BEHLE & LATIMER

/s/ Brian M. Rothschild

Brian M. Rothschild

Alex N. Vandiver

Attorneys for Plaintiff Glass America Midwest LLC